

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER IKAI VAN NOPPEN, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

VS.

INNERWORKINGS, INC., ERIC D.
BELCHER, and JOSEPH M. BUSKY,

Defendants.

Case No. 1:14-cv-01416

Hon. John Robert Blakey

CLASS ACTION

**NOTICE OF LEAD PLAINTIFF'S UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff, Plymouth County Retirement System, on behalf of the proposed Settlement Class, will move this Court on May 24, 2016 at 9:45 a.m., in Courtroom 1725, for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, *inter alia*: (a) preliminarily approving the proposed Settlement of the Action; (b) approving the proposed form of the notice and summary notice of the Settlement; (c) approving the proposed methods of disseminating notice to the Settlement Class; (d) setting a date for the Settlement Hearing; and (e) such other and further relief as this Court deems just and proper.

Lead Plaintiff is contemporaneously herewith filing a memorandum of law and Declaration of Jonathan Gardner, dated May 11, 2016, with annexed exhibits, in support of this motion.

A proposed Order Granting Preliminary Approval of Class Action Settlement, Approving Form and Manner of Notice, and Settling Date for Hearing on Final Approval of Settlement, which was negotiated by the parties to the Settlement, is also submitted herewith.

Lead Counsel has conferred with counsel for the Defendants and they do not oppose the motion.

Dated: May 11, 2016

Respectfully submitted,

By: /s/ Jonathan Gardner

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Liaison Counsel for the Class

CERTIFICATE OF SERVICE

I, Jonathan Gardner, certify that on this 11th day of May, 2016, I electronically filed this Notice of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Settlement with the Clerk of the U.S. District Court using the CM/ECF system which will be sent electronically to the registered participants as identified on the attached Electronic Mail Notice List.

s/ Jonathan Gardner

Jonathan Gardner

Mailing Information for a Case 1:14-cv-01416

Van Noppen v. InnerWorkings, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

☐ (No manual recipients)